

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DELAWARE MARKETING
PARTNERS, LLC, a Delaware
limited liability company,
Plaintiff

v.

CREDITRON FINANCIAL SERVICES,
INC., a Pennsylvania corporation, and
TELATRON MARKETING GROUP,
INC., a Pennsylvania corporation,
Defendants

)
)
)
) C.A. No.: 04 - 263 Erie
)

) Judge McLaughlin

) Magistrate Judge Baxter

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) TRIAL BY JURY DEMANDED

AFFIDAVIT OF ALFRED COVATTO

Being duly sworn according to law, Affiant, Alfred Covatto, does hereby attest
and state as follows:

1. I, Alfred Covatto, am the executive officer of Creditron Financial Corporation
and I am one of the people here most knowledgeable regarding the information and documents
requested by the Plaintiff.

2. For some time I have been suffering from an infection in my sinuses which is
of a type and nature which will require surgical intervention. In fact, surgery had been scheduled

for October 12, 2005 but had to be postponed because I developed persistent pneumonia. The surgeon needed to clear the pneumonia before proceeding with the surgery.

3. The infection and pneumonia have been incapacitating at times. Currently, pre-operative procedures are now scheduled for December 14, 2005 and sinus surgery is scheduled for December 15, 2005.

4. In addition to my own medical problems, my elderly mother (age 90) is severely ill and I am her power of attorney and the person in charge of making decisions and arrangements for her care. Recently, her health problems have consumed a lot of my time and attention recently.

5. Our senior vice president, Trish DeSanti-Boehm, is also very knowledgeable regarding the requested information and documents. She was involved in the business dealings which form the basis of the Plaintiff's claims. Unfortunately, she has suffered from complications related to her pregnancy and has been hospitalized on a number of occasions. Currently, her physician has confined her to bed.

6. The foregoing circumstances have made it extremely difficult for us to identify, locate and assemble the vast number of documents and records which have been requested by the Plaintiff. We have produced a large volume of records but, despite our best

efforts, we have not completed our search of documents and information to permit full and complete responses to Plaintiff's requests.

FURTHER THE AFFIANT SAYETH NOT.


Alfred Covatto

COMMONWEALTH OF PENNSYLVANIA)

: SS.

COUNTY OF ERIE)

ON THIS, the 8th day of December, 2005, before me a Notary Public, the undersigned officer, personally appeared Alfred Covatto, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he Executed the same for the purposes therein contained.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.



